

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISIONS

CASE NO.: 0:23-cv-61045-AHS

MEANETTE JARRETT,

Plaintiff,

v.

HOTEL EQUITIES GROUP, LLC, a foreign limited liability company, CH AVON FLORIDA, LLC, a foreign limited liability company, ATLANTIC HOTEL GROUP ASSETS, LLC, a Florida limited liability company, ATLANTIC HOTEL GROUP HOLDINGS, LLC, a Florida limited liability company, THE ATLANTIC HOTEL CONDOMINIUM ASSOCIATION, INC., a Florida not-for-profit corporation, 1602 ATLANTIC, LLC, a Florida limited liability company,

Defendants.

**DEFENDANT, 1602 ATLANTIC, LLC'S MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S DISCOVERY REQUEST**

Defendant, 1602 ATLANTIC, LLC ("Defendant"), by and through its undersigned counsel, moves this Court in this motion for entry of an Order extending the time to responde to Plaintiff's Discovery Requests dated October 9, 2023 and states:

1. On October 9, 2023, Plaintiff served Defendant with Interrogatories, Request for Production and Request for Admissions ("Discovery Request").
2. Defendant's responses to Discovery Request are due on November 8, 2023.
3. Good cause for an extension exists as Defendant and their counsel need additional time to file a response to Plaintiff's Discovery Request.

4. The granting of this Motion will not prejudice Plaintiff. This Motion is made in good faith and not for the purpose of delaying the proceedings in this matter.
5. By filing this Motion for Extension of Time, Defendant does not waive any objections to Plaintiff's Discovery.
6. Undersigned counsel has contacted Plaintiff's counsel with regard to this Motion but has not yet received a response.

WHEREFORE, Defendant, 1602 ATLANTIC, LLC., respectfully requests that this Court grant its Motion for Extension of Time to File a Response to Plaintiff's Request for Production, Request for Production and First Set of Interrogatories and grant such other and further relief as this Court deems just and proper.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on Novmber 8, 2023 I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

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